UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : 11 Cr 623 (JG)

- against - :

NOTICE OF MOTION FOR ORDER

AGRON HASBAJRAMI, : **RELEASING UNREDACTED OPINION**

Defendant. :

PLEASE TAKE NOTICE, that upon the annexed Declaration of Joshua L. Dratel, Esq., and all prior papers and proceedings herein, the defendant, AGRON HASBAJRAMI, will move before the Honorable John Gleeson, United States District Judge for the Eastern District of New York, at the United States Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, at a time and date to be set by the Court, or as soon thereafter as counsel may be heard, for an Order releasing to his security-cleared counsel an unredacted version of the March 8, 2016, opinion issued by Judge John Gleeson, denying Mr. Hasbajrami's motion to suppress the fruits of electronic surveillance conducted pursuant 50 U.S.C. §1881a; and, for any such other and further relief as to the Court seems just and proper.

Dated: New York, New York

July 25, 2016

/s/ Joshua L. Dratel JOSHUA L. DRATEL JOSHUA L. DRATEL, P.C. 29 Broadway, Suite 1412 New York, New York 10006 (212) 732-0707

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Attorneys for Defendant Agron Hasbajrami

To: THE HON. JOHN GLEESON

UNITED STATES ATTORNEY EASTERN DISTRICT OF NEW YORK